

NOW COME THE PLAINTIFFS, by their attorneys, and hereby move this Court for a one-day extension in which to file their proposed Final Pretrial Order. In support of this motion, Plaintiffs state as follows:

1. On Monday May 9, 2016, before noon, plaintiffs' counsel sent to the defense counsel a comprehensive draft of a proposed Final Pre-trial Order, complete with proposed stipulations of fact, witness list, exhibit list, jury instructions and voir dire.
2. On Thursday, May 12, 2016 at 4:50 pm, defense counsel sent plaintiffs' counsel an edited version of plaintiffs' proposed stipulations of fact, description of the case and a response to the plaintiffs' exhibit list. That's all.

3. As of Friday, May 13, 2016 at 10:18 AM, the day that the Final Pretrial is due to be filed, plaintiffs' counsel have not received any other portion of the defendants' proposed Final Pretrial Order.
4. It is manifestly unreasonable to expect counsel for plaintiffs to review and respond to the defendants' proposed exhibits, witness list, jury instructions, voir dire and other required items in less than a day.

WHEREFORE, plaintiffs respectfully request that plaintiffs be granted until the end of the day on Monday, May 16, 2016 in which to respond to the defendants' draft and file with the Court, the parties proposed Final Pre-trial Order.

Respectfully submitted,

/s Jeffrey L. Taren
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